

OFFICE OF AUDITS & ADVISORY SERVICES



CONTINUITY OF OPERATIONS (COOP) PLANNING

FINAL AUDIT REPORT

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RETIREMENT ASSOCIATION
TREASURER-TAX COLLECTOR

January 8, 2013

TO: Holly Crawford, Director
Office of Emergency Services

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: CONTINUITY OF OPERATIONS (COOP) PLANNING AUDIT

Enclosed is our report on the Continuity of Operations (COOP) Planning Audit. We have reviewed your responses to our recommendations and have attached them to the audit report.

The actions taken and/or planned, in general, are responsive to the recommendations in the report. As required under Board Policy B-44, we respectfully request that you provide quarterly status reports on the implementation progress of the recommendations. The Office of Audits & Advisory Services will contact you or your designee near the end of each quarter to request your response.

Also attached is an example of the quarterly report that is required until all actions have been implemented. To obtain an electronic copy of this template, please contact Jenny Chen at (858) 495-5651.

If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ
Chief of Audits

AUD:JLC:aps

Enclosure

c: Ronald Lane, Deputy Chief Administrative Officer, Public Safety Group
Tracy M. Sandoval, General Manager/Auditor and Controller
Dorothy Thrush, Group Finance Director, Public Safety Group

INTRODUCTION

Audit Objective The Office of Audits & Advisory Services (OAAS) completed an audit of Continuity of Operations (COOP) planning. The objective of the audit was to determine whether COOP plans are documented, updated, communicated, and tested to ensure that the County has the capability to operate effectively in the event of a disaster or other emergency.

Background Business continuity includes the capability of an organization to restore and provide mission essential functions following a catastrophic event. In 2006, the Office of Emergency Services (OES) established a standardized COOP template to assist County departments in documenting the processes and resources needed to restore vital County services after a disaster. Federal Emergency Management Agency (FEMA) interim guidance¹ on continuity of operations planning was used in development of the COOP template and other readiness procedures.

According to the OES, departments are responsible for developing and maintaining plans and procedures, delivering necessary training in the use of the procedures, and establishing regular testing and validation of their plans. The OES assists in facilitating exercises, providing training, and improving readiness Countywide. Each department has designated one department COOP coordinator (DCC). Each group has a group COOP coordinator (GCC) to assist their respective departments' DCCs and serve as a liaison between departments and the OES.

Numerous exercises and actual disasters have provided opportunities to test and improve readiness over the past seven years. These events include Firestorm 2007, the Southwest power outage in 2011, and Countywide operational desk exercises such as a pandemic scenario table top exercise in 2009 and participation in the Statewide Golden Guardian 2012 exercise.

Audit Scope & Limitations The scope of the audit focused on the COOP planning process, including governance, templates and tools, and policies and procedures for ensuring readiness in the event of a disaster. OAAS did not assess the capability of departments to execute the plans.

This audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing prescribed by the Institute of Internal Auditors as required by California Government Code, Section 1236.

Methodology OAAS performed the audit using the following methods:

- Reviewed applicable FEMA guidance and recommended procedures.

¹ Interim Guidance on Continuity of Operations Planning for State and Local Governments, Federal Emergency Management Agency/Department of Homeland Security, May 2004.

- Reviewed the COOP plan template for consistency with core components of FEMA Continuity Guidance Circular 1 (Circular 1).²
- Assessed the governance structure and Countywide guidance to ensure COOP expectations are clear, roles are defined, and departments are prepared to execute COOP plans if needed.
- Conducted surveys and interviewed key personnel to assess clarity of roles and responsibilities, training and testing, and readiness to execute their COOP plans.
- Tested a sample of 10 department COOP plans with mission essential functions for evidence that Circular 1 core components existed, including:
 - Business objectives, critical operations identified and prioritized.
 - Vital records, databases and systems identified.
 - Order of succession and delegation of authority established.
 - Roster of personnel performing essential functions established.
 - Alternate work sites and communication capability identified.
 - Recovery and resumption of operations established.
 - Regular COOP plan updates and testing established.

AUDIT RESULTS

Summary

Within the scope of the audit, COOP plans are generally documented, communicated, and tested. The OES has provided direction, tools, and procedures that are consistent with the core components defined in Circular 1. Additionally, department personnel appear to be knowledgeable about their responsibilities and expressed a high degree of readiness to execute COOP plans in the event of an emergency.

To further improve the COOP planning process, OAAS has the following finding and recommendation related to governance.

Finding I:

Additional Guidance Would Strengthen Readiness

Although the DCCs and key staff interviewed expressed a high level of readiness in the event of an emergency, OAAS noted the following:

- All 58 departments/divisions Countywide had a COOP plan. However, 7 of the 58 (12%) had not updated their plans within the last 12 months. Of the seven, one department with mission essential functions had not updated the COOP plan since 2008.
- Of 10 departments sampled, 3 (33%) had not tested or adequately identified alternate work sites.

² Continuity Guidance Circular 1 (CGC1) Continuity Guidance for Non-Federal Entities (States, Territories, Tribes, and Local Government Jurisdictions and Private Sector Organizations), Federal Emergency Management Agency/Department of Homeland Security, January 21, 2009.

- Of 10 key departments personnel that were interviewed/surveyed, 2 (20%) had indicated that they had not received COOP-specific training.
- The current COOP template does not provide written evidence of senior management review and approval.³
- A County policy does not exist that requires compliance with Circular 1 or defines the roles and responsibilities of departments and the OES.

The COOP template provided by OES and utilized by departments for documenting their COOP plans specifies that departments should annually: 1) update plans; 2) identify, assess, and test alternate worksites; and 3) provide COOP drills and refresher trainings. Additionally, Circular 1 recommends that COOP plans be reviewed and approved annually (by senior leadership) and emphasizes the importance of periodic testing, exercise, corrective action, and improvements.

It should be noted that even in the case where the COOP plan had not been updated since 2008, improvements and changes had been made (but not documented) as a result of the 2011 regional power outage and 2012 Golden Guardian exercise. However, if COOP plans are not updated regularly and changes documented, there is a risk that readiness could be diminished, especially if those with institutional knowledge are not available and greater reliance is placed only on the COOP plan document.

Recommendation: To strengthen the COOP planning and governance process, the OES should develop a Countywide COOP policy to include:

1. Annual review and approval, with COOP plan updates as necessary.
2. Requirements for periodic testing and training.
3. Defined roles and responsibilities of departments and the OES.

³ Of 10 DCCs interviewed, 8 indicated that management had reviewed and approved the updated COOP plans, but the approval was not documented. One DCC indicated that a review had not been conducted.

Office of Audits & Advisory Services

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DEPARTMENT'S RESPONSE



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December 19, 2012

RECEIVED

TO: Julie B. Nieminski
Chief of Audits

DEC 27 2012

OFFICE OF AUDITS &
ADVISORY SERVICES

FROM: Holly Crawford, Director
Office of Emergency Services

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: CONTINUITY OF OPERATIONS (COOP)
PLANNING

Finding I: Continuity of Operations (COOP) Planning audit, Report No. A13-006.

OAAS Recommendation:

To strengthen the COOP planning and governance process, the OES should develop a Countywide COOP policy to include:

1. Annual review and approval, with COOP plan updates as necessary.
2. Requirements for periodic testing.
3. Defined roles and responsibilities of departments and the OES.

Action Plan:

The County of San Diego's Office of Emergency Services (OES) has long been recognized as a regional leader in continuity planning. Both the National Association of Counties (NACo) and The Emergency Management Accreditation Program (EMAP) have presented awards to OES for the County's planning efforts to rapidly restore its essential services in the event of a disaster.

In keeping with OES' efforts to continuously enhance the County's COOP planning process, I agree with the audit recommendation to develop a Countywide COOP policy. OES would of course work with its stakeholders in finalizing policy language, but initial suggestions for draft language would include:

Unified San Diego County Emergency Services Organization

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1. Department Roles and Responsibilities: Identification of Essential Functions; annual COOP review; Bi-Annual COOP exercises/drills; COOP plan updates as necessary; staff training and awareness; new hire orientation; and Department Head acknowledgment/sign-off.
2. OES Roles and Responsibilities: Provide COOP templates and update templates as necessary; serve as subject matter experts and provide guidance; create central repository for updated COOPs; annually track and notify Executive Office staff (COOP Coordinators) of department compliance.


Planned Completion Date:

OES will provide a draft Countywide COOP policy for stakeholder review by February 2013 with a target date for CAO approval in May 2013.

Contact Information for Implementation:

Michael Davis, Senior Emergency Services Coordinator

If you have any questions, please contact me at 858-565-3490.


Holly Crawford
Director